

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

GREEN MOUNTAIN CAPITAL, LLC,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,

Defendant.

No. 1:19-cv-2603

JUMAR MANAGEMENT, LLC,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,

Defendant.

No. 1:19-cv-2708

**UNOPPOSED MOTION TO CONSOLIDATE**

Plaintiffs, GREEN MOUNTAIN CAPITAL, LLC (“Green Mountain”) and JUMAR MANAGEMENT, LLC (“Jumar”), through their undersigned counsel, hereby move this Court pursuant to Federal Rule of Civil Procedure 42 to consolidate the above referenced actions, and in support thereof, state as follows:

1. Federal Rule of Civil Procedure 42 provides that “if actions before the court involve a common question of law or fact, the court may: (1) join for hearing or trial any or all matters at issue in the actions; (2) consolidate the actions; or (3) issue any other orders to avoid unnecessary cost or delay.”

2. The above captioned actions involve common questions of law and fact in that each involves a plaintiff policyholder seeking coverage under a financial institution bond issued by

defendant Federal Insurance Company (“Federal”) for losses arising out of a fraudulent pyramid scheme to which the policyholders were victims. In the above cases, Federal issued separate bonds to Green Mountain and Jumar, but both bonds use the same coverage forms. In addition, Green Mountain and Jumar were victims of the same fraudulent pyramid scheme. Finally, Green Mountain and Jumar are affiliated companies and are represented by the same counsel, and the same counsel represents Federal in both cases.

3. Defendant Federal does not oppose the consolidation of the above actions.

4. Consolidation of these actions will enable the parties and the court to avoid unnecessary cost or delay.

WHEREFORE, Plaintiffs, Green Mountain and Jumar respectfully request that this Court consolidate the above captioned actions. A Scheduling Order has already been entered in case no. 1:19-cv-2603. The parties seek to have this Scheduling Order apply to both actions after they are consolidated.

Respectfully submitted,

/s/ Kevin J. Kuhn  
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Counsel for Plaintiffs Jumar Management LLC  
and Green Mountain Capital LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 29, 2019 a copy of Plaintiffs' Agreed Motion to Consolidate was served via electronically CM/ECF to:

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/s/ Kevin J. Kuhn  
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